

Stark, David

277212

From: Frank R. Ellerbe III <fellerbe@robinsongray.com>
Sent: Tuesday, July 17, 2018 9:39 AM
To: Stark, David; Heather Smith; Rebecca.Dulin@duke-energy.com; Nelson, Jeff; Hammonds, Lessie; Richard Whitt; tfrogers@austinrogerspa.com; ejones@selcsc.org; Scott Elliott; Samuel J. Wellborn; lbowen@selcnc.org
Cc: (F13403).Clients@f8eed.imanage.work
Subject: RE: Docket No. 2018-3-E DEC's Motion for a Protective Order (and other requests)

David:

Thanks for this response. We haven't yet heard from the Solar Business Alliance and our discovery responses would be due on Thursday, July 19th according to the original requests. We believe that we can provide a response to the discovery requests by July 27th that will be comprehensive as to the things that we either: (1) don't object to; or (2) have limited objections to. I suggest that you issue a protective order allowing us additional time until July 27th to make that production while reserving to SBA its right to contest our objections and any limited production that we make. We believe that SBA will be able to make a better informed decision on what, if any, matters that it wishes to contest once its representatives have reviewed our production.

Thank you for considering our proposal.

Frank



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From: Stark, David [mailto:david.stark@psc.sc.gov]
Sent: Thursday, July 12, 2018 1:56 PM
To: Heather Smith <heather.smith@duke-energy.com>; Rebecca.Dulin@duke-energy.com; Frank R. Ellerbe III <fellerbe@robinsongray.com>; Nelson, Jeff <jnelson@regstaff.sc.gov>; Hammonds, Lessie <lhammon@regstaff.sc.gov>; Richard Whitt <rlwhitt@austinrogerspa.com>; tfrogers@austinrogerspa.com; ejones@selcsc.org; Scott Elliott <sellott@elliottlaw.us>; Samuel J. Wellborn <swellborn@robinsongray.com>; lbowen@selcnc.org
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Parties:

I have reviewed DEC's motion filed by DEC on July 11, 2018, and would note that this is a very time sensitive matter. It would be helpful if I could get an idea about when -- roughly - I can expect a response from the South Carolina Solar Business Alliance, so that a proper and timely ruling can be made regarding the motion and requests made by DEC. I very much appreciate the parties taking a proactive and timely approach with regards to discovery issues and disputes; it facilitates a much more efficient discovery process and is beneficial to the proceeding as a whole.

I hope that some of the issues raised in DEC's July 11 filing may be able to be resolved by having discussion between the parties, and I would encourage the parties to communicate with that intention in mind.

Feel free to contact me with any procedural concerns or questions.

Regards,

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